

Subcontractor (*On-Site*) Oversight Procedure

This procedure shall be used by Ames Laboratory Employees to implement Integrated Safety Management for subcontract work (not vendors) that is performed on Ames Laboratory premises that is initiated by the use of a Purchase Order (PO).

1.0 APPROVAL RECORD

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The official approval record for this document is maintained in the Training & Records Management Office, 151 TASf.

2.0 REVISION/REVIEW INFORMATION

The revision description for this document is available from and maintained by the author.

3.0 PURPOSE AND SCOPE

This procedure shall be used by Ames Laboratory Employees to implement Integrated Safety Management for subcontract work (not vendors) that is performed on Ames Laboratory premises that is initiated by the use of a Purchase Order (PO). This procedure does not apply to vendors as defined by this procedure.

This procedure will outline:

1. The process used to initiate subcontractor work and determine the Environment, Safety and Health (ES&H) Hazard Level I, II or III.
2. Training requirements for the subcontractor based on the ES&H Hazard Level.
3. The responsibilities of the Requestor, Host, Escort, Project Manager and Environment, Safety, Health and Assurance (ESH&A).
4. The subcontractor requirements (training, compliance, insurance, OSHA documentation, notification and equipment/supplies).

4.0 Definitions

Activity

One or several action(s) and/or processes coordinated to perform a task.

Activity Supervisor

A person designated by the Group/Section Leader with responsibility for supervision and coordination of the development and/or operation of an activity.

Area Specific Training

Specialized training for subcontractors required due to the particular potential hazards that may be encountered when working in a specific location.

Job (Activity) Specific Training

Training for a particular task or type of operation.

Escort

An Ames Laboratory employee who will accompany a subcontractor(s) performing work. The escort is responsible for communicating emergency procedures for subcontractors and ensuring control of activities that the subcontractor will perform.

Group / Section Leader

A person who reports directly to a Program Director and has line management responsibility for space, equipment, activities, and employees.

Hazard Management Statement

The Hazard Management Statement shall define the extent of the hazard and the controls (engineering, administrative or personal protective equipment) utilized to minimize the risks associated with the hazard. The detail of the Hazard Management Statements shall be commensurate to the scope and the magnitude of the hazard and the associated risk.

Host/Requestor

An Ames Laboratory employee or associate who initiates subcontract work via a purchase order (PO). The host/requestor serves as the escort or delegates an escort for a visitor or subcontractor.

Project Manager

One who manages a project in an effort for a customer.

Subcontractor

Anyone involved in activities such as the repair of equipment, maintenance, demolition, construction, decorating, remodeling, instrument calibration and alteration including painting. This program does not apply to vendors as defined below.

Vendor

Anyone who performs routine or repeat activities such as food service suppliers, office equipment repair, computer specialists, sales, consultants, etc. These activities have hazards which are similar to those encountered and/or accepted by the general public in an office environment. This program does not apply to vendors.

Visitor

With the exception of employees and associates who have received General Employee Training, all persons entering Ames Laboratory are considered visitors. Visitors are the

responsibility of the host, requestor, escort or project manager. Visitors shall be accompanied at all times until job activity specific / area specific training has been received. Visitors less than 18 years of age must be supervised at all times.

5.0 PERFORMANCE

The following steps along with corresponding responsibilities shall be taken when subcontractor work is performed at the Ames Laboratory:

Step	Action	Responsibility
1.	Define Scope of Work (when, where, how, how long, who) and document via the Purchase Order.	Requestor
2.	Identify hazards using the Hazard Identification Checklist, Form 10200.003.	Requestor
Note	When Subcontract Work will be part of an activity for which Readiness Review is required, review of Subcontractor Training shall be incorporated into the Readiness Review.	
3.	Classify the subcontractor ES&H Hazard Level (I, II or III) using the criteria below:	ESH&A

Activity ES&H Hazard Levels I, II or III	Level
Activities with hazards similar to those encountered and/or accepted by the general public in an office environment. These activities have minimal scope and magnitude. The hazards created from these activities involve limited risk to the: <ul style="list-style-type: none"> health or safety of workers or the public, environment, facility or mission of the Laboratory. 	I
Activities with hazards similar to those encountered in a typical industrial / laboratory environment. These activities involve hazards whose scope may involve significant risk: <ul style="list-style-type: none"> to the health and safety of workers involved in the activity or those working with in the same room in which the activity is being performed, of short term localized environmental impacts, of minimal and localized damage to facilities or negative impacts on the performance of program or Laboratory functions. 	II
Activities with hazards that involve a larger scope than Hazard Level II and pose significant risk: <ul style="list-style-type: none"> to the health or safety of the public or on-site personnel, of widespread or lasting environmental effects, of damaging or impeding the mission of the Laboratory. 	III

Step	Action	Responsibility
4.	<p><u>If Activity Hazard Level I,</u></p> <ul style="list-style-type: none"> Document the Hazard Level using Subcontractor Oversight Checklist, Form 10200.102. Determine if additional safety training is necessary. Complete Purchase Order (PO). Provide the subcontractor with the Ames Laboratory Visitor's Safety Guide (#10200.001). Review additional information and responsibilities with subcontractor as necessary. <p><i>Hazard Level I - Procedure Complete</i></p> <p><u>If Activity Hazard Level II,</u></p> <ul style="list-style-type: none"> Schedule review meeting with ESH&A. Proceed to Step 5 <p><u>If Activity Hazard Level III,</u></p> <ul style="list-style-type: none"> Proceed to Step 14 	<p><i>ESH&A</i></p> <p><i>Requestor</i></p> <p><i>Requestor</i></p> <p><i>Requestor</i></p> <p><i>Requestor</i></p>
5.	Complete review with ESH&A	<i>ESH&A</i>
6.	Develop hazard management statements / control requirements and inform subcontractor.	<i>Requestor</i>
7.	<p>Review of Subcontractor Written Safety Programs to ensure they meet applicable DOE, Federal, State and local regulations. If subcontractor does not have written programs, the subcontractor must comply with Ames Laboratory Procedures.</p> <p>Refusal to supply written programs or comply with Ames Laboratory programs may initiate an evaluation and corrective actions accordingly.</p>	<i>ESH&A</i>
Note	The Host/Requestor must receive and review all Material Safety Data Sheets (MSDS's) of all chemicals and materials that are brought on Ames Laboratory premises. For additional guidance consult ESH&A if needed.	<i>Requestor</i>
8.	In conjunction with ESH&A, determine subcontractor safety performance items to be addressed in pre-job briefing.	<i>ESH&A & Requestor</i>

Step	Action	Responsibility
9.	Implement Hazard Controls (Hazard Management Statements)	<i>Requestor</i>
10.	Perform the following with the subcontractor:	<i>Requestor</i>

Hazard Level II Training Requirements
<ul style="list-style-type: none"> • Pre-Job Briefing • Distribute and review the Ames Laboratory Visitor's Safety Guide 10200.001. • Complete Subcontractor Training Documentation Form (10200.101). This includes: <ul style="list-style-type: none"> <input type="checkbox"/> Hazard Communication training, <input type="checkbox"/> Area Specific Training, <input type="checkbox"/> Job (activity) Specific Training, <input type="checkbox"/> Other elements determined in Step 9. • Complete Subcontractor Oversight Checklist (10200.102). • Forward a copy of the Subcontractor Training Documentation Form and Subcontractor Oversight Checklist to ESH&A at G40 TASF.

Note	<p>If subcontractor is <u>escorted</u> by an Ames Laboratory employee or associate for activity classified as a ES&H Hazard Level II, the following requirements will be waived:</p> <ul style="list-style-type: none"> • Completion of the Subcontractor Training Documentation Form. • The Subcontractor Oversight Checklist. <p>The subcontractor is still required to comply with all applicable requirements.</p>
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11.	Perform work within established controls.	<i>Subcontractor</i>
12.	Inspect subcontractor site to ensure work is being performed within established controls.	<i>ESH&A & Requestor</i>
13.	Notify ESH&A of suspected non-compliance.	<i>Requestor or Subcontractor</i>
Hazard Level II – Procedure Complete		
14.	If Activity is Hazard Level III, then Readiness Review Procedure (10200.010) shall be required.	<i>Requestor</i>

6.0 REQUIREMENTS

6.1 Subcontractor Training Requirements:

- Subcontractors shall have the appropriate environment, safety and health training including Hazard Communication (Right-To-Know), Area Specific and Job (Activity) Specific Training.
- Subcontractors shall receive adequate orientation for the actions they undertake while at the Ames Laboratory.

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- For recurring work, retraining shall be performed:
 - ☐ Every 12 months
 - ☐ Whenever the subcontractor is exposed to new potentially hazardous activities
 - ☐ When deviations in compliance and safety are observed
 - ☐ When training/regulations change
- Subcontractors may receive a detailed Safety Training Orientation from Ames Laboratory for larger scope activities (video and discussion).
- ESH&A must receive and sign the Subcontractor Training Form (10200.101) and Subcontractor Oversight Checklist (10200.102) before subcontract work is allowed to begin. ESH&A will retain a copy of the Subcontractor Training Form and Subcontractor Oversight Checklist.

6.2 Subcontractor Environment, Safety and Health Compliance Requirements:

Refer to the Indemnification, Insurance and Safety Document issued from Purchasing and Property Services. It is sent with each Purchase Order for subcontractor activity.

6.3 Subcontractor Notification Requirements:

Refer to the Indemnification, Insurance and Safety Document issued from Purchasing and Property Services. It is sent with each Purchase Order for subcontractor activity.

6.4 Equipment and Supplies Requirements:

The subcontractor is to supply and maintain:

- Equipment and supplies necessary to complete the work.
- Safety equipment including such items as barrier tape, Lockout / Tagout supplies, monitoring equipment, fall arresting equipment, personal protective equipment.
- Material Safety Data Sheets for chemicals and materials brought onto Ames Laboratory premises.
- Performance history such as OSHA 300 Logs, Proof of Insurance and associated records upon request.

7.0 POST PERFORMANCE ACTIVITY

At the end of each contract, the subcontractor activity will be inspected by the requestor to ensure:

- Proper housekeeping
- No damage has occurred to the premises
- Dosimetry badges, records, documents, blue prints and other items supplied by the Laboratory are returned to the appropriate Laboratory Office.
- Work was completed in accordance with specifications.
- Generated wastes have been properly handled and disposed of per the contract between Ames Laboratory and the Subcontractor.
- No hazardous materials are left on Ames Laboratory premises.

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If the inspection determines poor housekeeping, damage to premises, work not completed to specifications, waste has been taken for disposal, etc., contact the Budget Office for course of action.

8.0 ADDITIONAL INFORMATION

- Subcontractor Training Documentation (Form 10200.101)
- Subcontractor Oversight Checklist (Form 10200.102)
- Ames Laboratory Visitor Safety Guide (10200.001)
- Project Completion Inspection and Acceptance Procedure (46300.020)
- Readiness Review Procedure (10200.010)
- Hazard Identification Checklist (Form 10200.003)
- Ames Laboratory Indemnification, Insurance and Safety Document